

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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VIACOM INT'L INC., ET AL.,  
  
                                Plaintiffs,  
                                v.  
  
YOUTUBE, INC., ET AL.,  
  
                                Defendants.

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ECF Case  
Civil No. 07-CV-2103 (LLS)

THE FOOTBALL ASSOCIATION  
PREMIER LEAGUE LIMITED, ET AL.,  
on behalf of themselves and all others  
similarly situated,  
  
                                Plaintiffs,  
                                v.  
  
YOUTUBE, INC., ET AL.,  
  
                                Defendants.

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**NOTICE OF MOTION**

ECF Case  
Civil No. 07-CV-3582 (LLS)

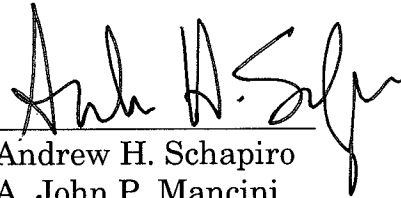
PLEASE TAKE NOTICE that, upon: (i) the Memorandum of Law in Support of Defendants' Motion for Summary Judgment; (ii) Defendants' Local Rule 56.1 Statement of Material Facts As To Which There Is No Genuine Issue To Be Tried; (iii) the Declaration of Andrew H. Schapiro, dated March 5, 2010, and the exhibits attached thereto; (iv) the Declaration of Michael Rubin, dated March 5, 2010, and the exhibits attached thereto; (v) the Declaration of Roelof Botha, dated February 26, 2010, and the exhibits attached thereto; (vi) the Declaration of Arthur Chan, dated October 30, 2009; (vii) the Declaration of Chad Hurley, dated March 3, 2010, and the exhibits attached thereto; (viii) the Declaration of David King, dated March

1, 2010, and the exhibits attached thereto; (ix) the Declaration of Zahavah Levine, dated March 4, 2010, and the exhibits attached thereto; (x) the Declaration of Christopher Maxcy, dated February 28, 2010, and the exhibits attached thereto; (xi) the Declaration of Daniel Ostrow, dated August 8, 2009; (xii) the Declaration of Suzanne Reider, dated March 1, 2010; (xiii) the Declaration of Micah Schaffer, dated March 2, 2010, and the exhibits attached thereto; (xiv) the Declaration of Michael Solomon, dated March 3, 2010; (xv) the Declaration of Hunter Walk, dated February 28, 2010, and the exhibits attached thereto; and (xvi) all papers and pleadings previously filed herein,

Defendants YouTube, Inc., YouTube, LLC and Google Inc. (collectively, “YouTube”), by their undersigned counsel, will move this Court at the United States Courthouse, 500 Pearl Street, New York, New York, before the Honorable Louis L. Stanton, United States District Judge, for an Order, pursuant to Federal Rule of Civil Procedure 56(b), that YouTube is entitled to summary judgment: (1) that YouTube qualifies for protection under Section 512(c) of the Digital Millennium Copyright Act, 17 U.S.C. § 512(c) *et seq.*, against all of plaintiffs’ direct and secondary copyright infringement claims; (2) on plaintiffs’ claims for contributory liability under the theory of inducement; and (3) for such other and further relief as this Court deems just and proper.

Dated: March 5, 2010  
New York, New York

Respectfully submitted,



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